

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANGEL D. MORALES VALLELLANES
Plaintiff

CIVIL NO. 97-2459(GAG) (CVR)

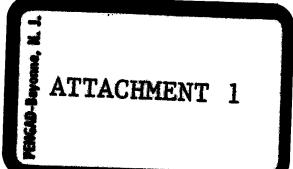
v.

JOHN POTTER POSTMASTER
GENERAL, ET ALS
Defendants

SWORN STATEMENT

I, Luis Rodriguez, of legal age, single and a federal employee for the U.S. Attorney's Office, U.S. Department of Justice since August 2002 do declare under oath and pursuant to 28 U.S.C. §1746 as follows:

1. My personal circumstances are as stated above.
2. I was Legal Assistant to AUSA Fidel Sevillano from June 15, 2005 until November 13, 2006 and the case of Angel Morales Vallellanes was one of the cases assigned to me.
3. I do recall that during the months of June, July, September and October 2006 depositions were taken of the plaintiff, Angel Morales, and plaintiff's announced fact witnesses. Plaintiff's expert witness (psychiatrist) deposition was taken on October 24, 2006.
4. That before the deposition for Mr. Radamés Sierra dated June 20, 2006 began, I personally hand delivered the economic report and curriculum vitae of Dr. Mohinder Bhatia to



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attorney Miguel Miranda without any formality as to receipt and/or transmittal letter because I thought at the time that there was no need for it as we were all in the midst of numerous depositions and, to expedite matters, such delivery was done outside the record and in a casual informal manner.

5. I also recall that during the months of June, July, September and October 2006 and after the numerous depositions were taken of the plaintiff, as well as plaintiff's fact and expert witnesses no allegation or inquiry was ever made by the plaintiff as to any issue related to Dr. Bhatia's economic report.
6. The above is the truth and nothing but the truth.

In San Juan, Puerto Rico, on this 4th day of September 2007.



Luis Rodriguez
Affiant under oath